

2.1 INTRODUCTION

The goal of the illicit discharge elimination program is to detect and eliminate non-stormwater discharges (except those exempt discharges listed in Table 1-2) from entering the storm drain system to reduce pollutants from such discharge to the maximum extent practicable. Each Permittee's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as shown in Table 2-1.

Table 2-1 Permit Requirements - Illicit Discharge Elimination		
Report Section	Requirement	Permit Section
2.2.2 2.2.3	Implement procedures for containment and cleanup of illicit discharges.	4.G.3.a
2.2.3	Implement procedures for investigation of illicit discharges.	4.G.3.b
2.2.4	Implement of procedures to educate inspectors, maintenance workers and other field staff to notice illicit discharges during the course of their daily activities and report such occurrences.	4.G.1.c
2.2.5	Implement of enforcement procedures to eliminate illicit discharges.	4.G.3.b
2.2.6	Implement of a record keeping system to document illicit discharges.	4.G.1.b & U-4.F.13
2.2.7	Implement procedures to map all illicit discharges	4.G.1.b

Although not set as a requirement of the 2001 NPDES Permit, permittees should continue to maintain and use industrial/commercial education and outreach materials. Implementation guidelines for this component are included in Section 2.2.8

The baseline objectives of the program are:

- Incidental spills, or disposal (including sanitary sewer leaks or overflows) reported by the public or other agencies or observed by Permittee field staff during the course of their normal daily activities will be investigated, contained and cleaned up.
- Prohibited non-stormwater discharges to the storm drain system reported by the public or other agencies or observed by Permittee field staff during the course of their normal daily activities (such as surface runoff associated with washdown from an industrial site) will be eliminated through voluntary termination or enforcement action.
- Suspected prohibited non-storm discharges in the storm drain system reported by the public or other agencies or observed by Permittee staff during the course of their normal daily activities, that may result from illicit connections or whose origin is unknown, will

be investigated to determine the nature and source of the discharge and eliminated through voluntary termination or enforcement action.

2.2 PROGRAM IMPLEMENTATION ELEMENTS

2.2.1 Spill Prevention Methods

The best way to contend with spills is to prevent them from occurring. Guidance is included in Appendix B.

2.2.2 Spill Prevention Coordination

Within agency responding divisions or sections, responsible staff, and level of support provided to lead emergency response agencies, will be identified. Within agency, spill response training, spill response equipment and activities to improve spill response procedures will be identified. Guidance is included in Appendix C.

2.2.3 Spill Investigation, Containment and Cleanup

Standardized procedures will be implemented to investigate, contain and clean up spills. These must include procedures to ensure that sewage treated with disinfection agents will not be discharged into the storm drain system to the extent practicable. The standard procedures include:

- Receive call on spill (see also Section 4, Public Reporting).
- Dispatch appropriate personnel to perform material investigation and cleanup.
- Contain spill/material and minimize release to storm drain system or receiving waters.
- Record required information at spill site.
- Perform field tests as necessary to determine type and source of spill.
- If the call was received through the LACDPW Hotline, notify the LACDPW dispatcher upon incident closure.

Standard procedures will be implemented to respond within one business day of discovery or a report of a suspected illicit discharge, with activities to abate, contain, and clean up all illicit discharges, including hazardous substances. Investigation of illicit discharges will be carried out as soon as practicable.

Guidance is included in Appendix D.

2.2.4 Education Program for Inspectors, Maintenance and Field Staff

Permittee staff will be required to implement the baseline objectives of observing, reporting, investigating and eliminating illicit discharges to the storm drain system.

Standardized procedures will be implemented to educate inspectors, maintenance workers, and other field staff to notice illicit discharges during the course of their daily activities and report them. The standard procedures include:

- Compile and/or prepare training materials, such as handouts and posters. Topics will include:
 - Stormwater quality requirements
 - Types of illicit discharges/disposal
 - Reporting forms
- Identify staff who conduct field activities and others who may benefit from training.
- Present information on illicit discharges during regular safety and tailgate meetings.
- Discuss how to report illicit discharges:
 - Call in report to request investigation and cleanup.
 - Fill out illicit discharge reporting forms.

Guidance for conducting the staff educational program for noticing and reporting illicit discharges is included in Appendix E.

Refresher training for all targeted employees who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges will be conducted annually.

The education program will also help appropriate Permittee staff to determine the appropriate follow-up activity when evidence of illicit discharges is observed. This includes:

- If the nature and source of the discharge is known or readily apparent, enforcement procedures will be initiated as discussed in Section 2.2.5.
- If the nature and source of the discharge is not known, additional investigation techniques will be used to determine the nature of the material and investigate the source. Guidance is included in Appendix F.
- If the illicit discharge is suspected to be through an illicit connection, procedures described in Section 3, Illicit Connection Elimination, will also be followed.

2.2.5 Standardized Enforcement Procedures

Enforcement procedures will be implemented to eliminate illicit disposal or discharges. The procedures will be followed when the source and nature of the discharge is known. Enforcement procedures will be consistent with the Permittee's legal authority. While legal authority for Permittees varies, most enforcement processes follow a common sequence. Typically they include:

- Verbal or written warnings for minor violations
- Formal notice of violation or non-compliance with specific actions and time frames for compliance
- Cease and desist or similar order to comply
- Specific remedies such as civil penalties (e.g., infraction), non-voluntary termination with cost recovery, or referral for criminal penalties or further legal action

Enforcement activity will begin at the appropriate level as determined by the Permittee's authorized representative. It need not necessarily be imposed sequentially. For incidents that are more severe or threatening at the outset, enforcement will start at an increased level. Enforcement steps will be accelerated if there is evidence of a clear failure to act, or an increasing severity of the discharge. A sample enforcement strategy and guidance are included in Appendix G.

2.2.6 Record Keeping and Documentation

A standardized record keeping system will be implemented to document illicit discharges detected within the local jurisdiction. The standard elements are:

- Record the following minimum information on all detected illicit discharges:
 - Date/time of the incident
 - Location
 - Type of material
 - Source, if determined
 - Action taken
 - Date incident was closed
- Forward the information to a designated individual/department.

A form that can be used to collect this information, *Illicit Discharge/Connection Reporting and Response* form, is included in Appendix H.

2.2.7 Mapping Illicit Discharges

The 2001 NPDES permit requires all permittees to map all illicit discharges within their local jurisdiction. In addition, as presented in Section 2.2.6, a standardized record keeping system (most likely in the form of a tabular database) will be implemented. A system is needed to facilitate analysis and identify priority areas of illicit discharges. A Geographic Information System (GIS) is the ideal tool to spatially integrate and analyze the required data.

A standardized mapping system using GIS will be implemented to map all illicit discharges within the local jurisdiction.

2.2.8 Industrial/Commercial Outreach Materials

Industrial/commercial education and outreach materials will be made available to field staff to be handed out as needed whenever illicit discharges are observed. The following materials have been developed for use by all Permittees under the Immediate Outreach component of the Public Information and Participation Program:

- Flyers/posters of Good Operating Practices for:
 - Auto repair industry
 - Gas stations
 - Food and restaurant industry

Copies of the materials are included as Appendix I.

The following materials were developed as a joint effort between the Industrial/Commercial Educational Program and the Five-Year Storm Water Public Education Strategy component of the Public Information and Participation Program of the 1996 NPDES Permit, and will be available for this Illicit Connection/Illicit Discharge Elimination Program:

- General stormwater quality brochure for industrial/commercial facilities.
- Fact sheets on all industrial groups regulated under Phase 1 of the federal stormwater program.